

LEILA W. MORGAN

California State Bar No. 232874

225 Broadway, Suite 900

San Diego, CA 92101-5030

(619) 234-8467/Fax: (619) 687-2666

E-Mail: leila_morgan@fd.org

Attorneys for Ms. Salazar-Sandoval

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE MARILYN L. HUFF)

UNITED STATES OF AMERICA,

CASE NO. 08cr0285-H

Plaintiff,

DATE: April 7, 2008

TIME: 9:00 A.M.

V.

DEFENDANT'S NOTICE OF MOTION AND
MOTION FOR AUTHORIZATION TO
CONDUCT FOREIGN DEPOSITIONS

ESMERALDA SALAZAR-SANDOVAL,

Defendant.

TO: KAREN HEWITT, UNITED STATES ATTORNEY; AND
REBECCA KANTER, ASSISTANT UNITED STATES ATTORNEY;

PLEASE TAKE NOTICE that on April 7, 2008 at 9:00 a.m., or as soon thereafter as counsel may be heard, the defendant, Esmeralda Salazar-Sandoval, by and through her counsel, Leila W. Morgan, and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motion.

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MOTIONS

The defendant, Esmeralda Salazar-Sandoval, by and through her attorneys, Leila W. Morgan, and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order for:

1) Foreign Depositions to be Conducted

This motion is based upon the instant motion and notice of motion, the attached statement of facts and memorandum of points and authorities, and all other materials that may come to this Court's attention at the time of the hearing on this motion.

Respectfully submitted,

DATED: March 28, 2008

/s/ Leila W. Morgan
LEILA W. MORGAN
Federal Defenders of San Diego, Inc.
Attorneys for Ms. Salazar-Sandoval
Leila_Morgan@fd.org